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9
10 *Attorneys for Debtors
and Debtors in Possession*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re

15 PG&E CORPORATION,

16 -and-

17 PACIFIC GAS AND ELECTRIC
COMPANY,
18 Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**SECOND SUPPLEMENTAL
DECLARATION OF HENRY
WEISSMANN IN SUPPORT OF
APPLICATION OF DEBTORS
PURSUANT TO 11 U.S.C. § 327(e) AND
FED. R. BANKR. P. 2014(a) AND 2016
FOR AUTHORITY TO RETAIN AND
EMPLOY MUNGER, TOLLES & OLSON
LLP AS COUNSEL FOR CERTAIN
MATTERS FOR THE DEBTORS THE
EFFECTIVE AS OF THE PETITION
DATE**

1 Pursuant to 28 U.S.C. § 1746, I, Henry Weissmann, hereby declare as follows:

2 I am a partner at Munger, Tolles & Olson LLP (“**MTO**” or the “**Firm**”), located at 350 S.
3 Grand Ave., 50th Floor, Los Angeles, California 90071, and have been duly admitted to practice
4 law in the State of California and the United States District Courts in California.

5 I submit this declaration (“**Second Supplemental Declaration**”) to supplement my initial
6 and first supplemental declarations, filed on April 1, 2019 [Dkt. No. 1168] and April 10, 2019
7 [Dkt No. 1301], in support of the Application of PG&E Corporation and Pacific Gas and Electric
8 Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
9 captioned chapter 11 cases (the “**Chapter 11 Cases**”), for authority to employ and retain MTO as
10 their counsel for certain Specific Matters, effective as of January 29, 2019 (the “**Petition Date**”),
11 pursuant to section 327(e) of title 11 of the United States Code (the “**Application**”).¹

12 Based on the search of the Client Database and reasonable inquiry, listed as **Exhibit A** to
13 this Second Supplemental Declaration are those Interested Parties, or affiliates thereof, that are or
14 have been MTO clients in the two years immediately preceding March 31, 2019. This includes a
15 supplemental search of those Interested Parties identified in the Application as well as additional
16 Interested Parties that have been identified since that Application was filed. None of the
17 representations listed on **Exhibit A** or described herein is adverse to the interests of the Debtors or
18 their estates with respect to the Specific Matters, and all prior and current MTO representations of
19 the clients, former clients, or their affiliates and/or subsidiaries are or have been in matters
20 unrelated to the Specific Matters.

21 As a further supplement to the information in Exhibit A, MTO has been engaged by the
22 Office of the Attorney General of the State of California and the Department of Law of the State
23 of New York (the “**State AGs**”) in a challenge to the proposed merger between Sprint Corporation
24 and T-Mobile US, Inc. On June 11, 2019, the State AGs filed a Complaint against Sprint
25 Corporation, T-Mobile US, Inc., Deutsche Telekom AG, and Softbank Group Corporation in the
26 United States District Court for the Southern District of New York, seeking to enjoin the Sprint/T-

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28 ¹ Capitalized terms used but not defined herein shall have the meaning given those terms in the Application.

1 Mobile merger. This matter (the “**Merger Litigation**”) is unrelated to the Specific Matters, the
2 Debtors, or the Chapter 11 Cases.

3 MTO has received informed written consent from both the Debtors and the State AGs to
4 MTO’s representation in the Merger Litigation. As part of that consent, MTO will screen
5 attorneys and paralegals working on the Merger Litigation from work in these Chapter 11 Cases
6 and vice versa, with one exception: there is an individual MTO attorney working on the Merger
7 Litigation who has also worked on and will continuing working on certain matters for the Debtors
8 related to power purchase agreements, which matters do not involve the State AGs.

9 With respect to MTO attorneys and paralegals engaged on the Merger Litigation (and with
10 the one exception discussed above), and any other attorneys or paralegals screened under MTO’s
11 screening procedures (collectively, the “**Screened MTO Professionals**”), MTO’s conflicts
12 department distributes a memorandum to all MTO personnel directing that (a) the Screened MTO
13 Professionals are absolutely barred from any involvement in the representation of the Debtors, (b)
14 the Screened MTO Professionals are absolutely denied access to all files related to the
15 representation of the Debtors, and (c) all MTO personnel are absolutely barred from discussing
16 with the Screened MTO Professionals any aspect of the representation of the Debtors.

17 Finally, and by way of clarification, Exhibit A to my amended declaration [Dk. No. 1168]
18 indicated that MTO current represented or has represented party-in-interest Joseph Johnson. Upon
19 further inquiry, MTO has determined that the Joseph Johnson it represents is a different person
20 than the Joseph Johnson who is a party-in-interest in the Chapter 11 Cases.

21 I believe that MTO does not represent or hold any interest adverse to the Debtors or their
22 estates with respect to the Specific Matters.

23 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
24 and correct.

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1 DATED: June 14, 2019

By: /s/ Henry Weissmann

Henry Weissmann

MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

Los Angeles, California, 90071

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Exhibit A

Interested Party	Status
Aera Energy LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Aera Energy LLC (Coalinga)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Aera Energy LLC (N. Midway Sunset)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Aera Energy LLC (Oxford)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Aera Energy LLC (S. Belridge)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Agua Caliente Solar, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Amerigas Propane	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
AT&T	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
AT&T Corp. – Lease Administration	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
AT&T Corporate Real Estate	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
AT&T Mobility II LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
AT&T Network	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
AT&T PCS Wireless Services	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Atlantica Yield	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Atlantica Yield plc, Mojave Solar LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Baker Hughes Process & Pipeline Services	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Baker Hughes US Land	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Bank of America	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Bank of America Merrill Lynch	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Bank of America, N.A.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Bank of America, N.A. (Admin Agent - \$300M)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Berkshire Hathaway AmGUARD Insurance Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Berkshire Hathaway Energy Renewables	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Berkshire Hathaway International Insurance Limited (PDW)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
BrandSafway LLC – West Coast	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Bright House Networks LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Burney Forest Products	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Corporation	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Energy Solutions, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Geysers Co. LP (KW#1)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Geysers Co. LP (KW#2)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Geysers Co. LP (WFF)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine King City Cogen LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine King City Cogen.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Calpine LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Los Esteros	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Monterey Cogen Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Pittsburg Power Plant	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Calpine Retained Assets Agreement	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Cardinal Cogen	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Central (VIA Wireless LLC)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
CH2M HILL Engineers, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Charter Communications	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
ChemTreat, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Citi	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Citibank NA, as Administrative Agent for the Utility Revolving Credit Facility	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Citibank, N.A.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Citibank, NA (Admin Agent - \$3B)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Citigroup Energy Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Citigroup Global Markets	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Citizens Telecommunications	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Clearwire	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Coalinga Cogeneration Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Comcast	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Conterra Wireless Broadband LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Coral Power LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
County of San Diego	MTO does not represent the County of San Diego. MTO currently represents and/or has in the past represented the San Diego County Employees Retirement Association, which is an independent entity from the County of San Diego, in matters wholly unrelated to the Debtors' chapter 11 cases
Credit Suisse Energy LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
DE Shaw	MTO has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Desert Sunlight 300, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Dynergy Marketing and Trade, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Dynergy Morro Bay, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Dynergy Moss landing, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Dynergy Power, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
EnerTouch, Inc. - Energizing Indiana	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
F.D. Thomas Inc.	MTO has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Fidelity Management Trust Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Frito Lay Cogen	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Frito-Lay, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Frontier Communications	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Frontier Communications of America	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
GATX/Calpine Cogen-Agnews Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
GE Oil & Gas - North America	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
GE Renewable Energy	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Geico General Insurance Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Geico Indemnity Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Gelco Corporation d/b/a GE Fleet Services	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Gencon Entities	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
General Electric International - Power Services	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
General Electric International Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
GenOn Delta, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
GenOn Energy Management LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
GenOn Energy, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Geysers Power Company, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Gilroy Energy Center, LLC, Creed Energy Center, LLC and Goosehaven Energy Center, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Goldman Sachs Bank USA	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Goldman, Sachs & Co	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Google for Invoice Issues	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Google Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Government Employees Insurance Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Hach Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
High Plains Ranch II, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Hornitos Telephone Co.	MTO has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
International Business Machines Corp.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Invenergy Wind Development LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
J. Aron and Company LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Jackson Valley Energy Partners	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Johns Manville	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Kern River	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Kern River Cogen Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Kern River Gas Transmission Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Los Esteros Critical Energy Facility LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Martinez Cogen Limited Partnership	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
MCI Worldcom	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Merrill Lynch	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Merrill Lynch Commodities Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Merrill Lynch, Pierce, Fenner & Smith Incorporated	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Metcalf Energy Center	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
MidAmerican Energy	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Midcoast Marketing (US) L.P.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Midset Cogen Co.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Midway Sunset Cogeneration Co.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Mirant Energy Trading, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Mitsubishi Electric Power Products, Inc. - Substation Division	MTO has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
MCI Telecommunications Corp	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Mojave Solar LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Morgan Stanley / ISG Operations	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Morgan Stanley Bank	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Morgan Stanley Bank /Morgan Stanley Senior Funding	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Morgan Stanley Bank, N.A.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Morgan Stanley Capital Group Inc	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Morgan Stanley Senior Funding, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
National Fire & Marine Insurance Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
National Fire & Marine Insurance Company (Berkshire Hathaway Specialty Insurance)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
New Cingular Wireless PCS, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Nextel Communications	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Nextel of California, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Noble Americas Energy Solutions LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
NOV FluidControl, a division of National Oilwell Varco, LP	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
NRG Energy, Inc., Clearway Energy, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
NRG Marsh Landing, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
NRG Power Marketing, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
NRG Solar Alpine LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
NRG Solar Kansas South LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
NV Energy	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
OCCID ENER MKT	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Occidental Energy Marketing Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Occidental Energy Ventures Corp	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Occidental Power Services, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
OXY ENER CANADA	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Pacific Bell Telephone Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Pacificorp	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Petrochem Insulation Inc.	MTO has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Ponderosa Telephone Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
POWEREX	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
RBC Capital Markets	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Reliant Energy Services, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Remedial Construction Services, LP	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
RRI Energy Services	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Ruby Pipeline, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Russell City Energy Company LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Safway Services, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Salinas River Cogen Co.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Sargent Canyon Cogeneration Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
SBC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
SBC Services Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Sedgwick	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Shell Energy	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Shell Energy North America (US), L.P.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Shell Energy US	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Shell Energy CAN	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Shell Trading (US) Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Shell Western E & P	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Sierra Energy	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Solar Turbines Incorporated	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Southwestern Bell Telephone LP	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Sprint and Sprint Spectrum-Nextel	MTO does not represent these entities. MTO currently represents and/or has in the past represented an affiliate of the majority shareholder of Sprint Corporation in matters wholly unrelated to the Debtors' chapter 11 cases
Starwood Energy Group Global LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
State of California Office of the Attorney General	See declaration for description.
Statewide Traffic, Safety & Signs, Inc.	MTO has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
Stroock & Stroock & Lawn LLP	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
STS HydroPower Kekawaka	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
STS HydroPower Ltd.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
STS Hyrdopower LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Suddenlink Communications	MTO has in the past represented this entityand/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Sumitomo Mitsui Banking Corporation	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Sunrise Power Company, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
TATA America International Corp.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Tata Consultancy Services	MTO has in the past represented this entityand/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
TDS Telecom	MTO has in the past represented this entityand/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Those Certain Underwriters Subscribing to Policy No. Prpnal 701248 as Subrogee of Starwood Capital Group LP	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
TMO CA/NV LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Topaz Solar Farms LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Trench Plate Rental Co.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Triton Construction Services	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
U.S. Cellular	MTO has in the past represented this entityand/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Ubiquitel, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases

Interested Party	Status
United States Aircraft Insurance Group (USAIG)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
US Aviation Insurance Group	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Vantage Wind Energy, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Verizon (Airtouch)	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Verizon Business Network Services	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Verizon Network Operations	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Verizon Wireless	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Verizon Wireless - Network Real Estate C Vistra Energy	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Wachovia Corporate Services, Inc.	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Wells Fargo Bank Northwest, National Association, as Trustee Mac: U1228-051	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Wells Fargo Bank, NA	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Wells Fargo LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Wells Fargo Securities, LLC	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases
Western Asset Management Company	MTO currently represents and/or has in the past represented this entity and/or certain affiliates or subsidiaries in matters wholly unrelated to the Debtors' chapter 11 cases